

This comment is submitted to support retention of Morse code learning opportunities and testing requirements.

The purpose of this comment is twofold in relation to NPRM 05-235:

- (1) Identify current maritime-related telegraphy requirements;
- (2) Indicate current Morse code amateur radio activity to discourage reallocation of the Morse code CW sub-bands.

The following has been extracted from the current 47 CFR, Part 80 documentation.

As an aside, although I did not find this in the current documentation, it is noteworthy to realize that the frequency 8.364 MHz CW (simplex) - Int'l Lifeboat, Life raft, & Survival Craft Frequency, may still be used. I would not be surprised to learn that much of the old "coffee grinder" life raft distress equipment used on this frequency is still operational and deployed aboard both aircraft and sailing vessels for use in dire emergency situations.

Even though we realize that international calling and distress Morse code frequencies (i.e. 500 KHz) are no longer guarded by maritime land and ship stations, The Code of Federal Regulations, Title 47: Telecommunication, Part 80 - Stations in the maritime services, still refers to many types of safety and emergency radiotelegraph signals:

Safety communication: The transmission or reception of distress, alarm, urgency, or safety signals, or any communication preceded by one of these signals, or any form of radio communication which, if delayed in transmission or reception, may adversely affect the safety of life or property.

Safety signal: The safety signal is the international radiotelegraph or radiotelephone signal which indicates that the station sending this signal is preparing to transmit a message concerning the safety of navigation or giving important meteorological warnings.

Urgency signal: The urgency signal is the international radiotelegraph or radiotelephone signal which indicates that the calling station has a very urgent message to transmit concerning the safety of a ship, aircraft, or other vehicle, or of some person on board or within sight.

Distress signal: The distress signal is a digital selective call using an internationally recognized distress call format in the bands used for terrestrial communication or an internationally recognized distress message format, in which case it is relayed through space stations, which indicates that a person, ship, aircraft, or other vehicle is threatened by grave and imminent danger and requests immediate assistance.

Unless § 80.68, Facilities requirements for public coast stations using telegraphy, has been deleted or revised, A1A telegraphy requirements still indicate utility. Work within any of the related aeronautic or maritime industries and being a valuable, proficient amateur radio operator are certainly not mutually exclusive. For this reason alone, deleting the requirement opportunity to learn merely the basics of Morse code does not make sense.

46 CFR 10.401(h) specifies the practical signaling examination requirements (flashing light) for USCG certification. Students learn Morse code characters for the alphabet and numerals 0-9. The final exam consists of the student recognizing, recording and decoding flashing light signal codes from Pub No. 102 at 6 words per minute, relative to the requirements of the Seafarers' Training, Certification and Watch Keeping (STCW) Code.

Use of the current amateur radio frequency allocations for Morse code operation is vibrantly alive worldwide. Diminishing the current Morse code frequency allocations by deleting the Morse code testing requirement and reallocating those frequencies for other uses will certainly, over time, limit the number of operators using this mode. This forced cause for diminishment will not, however, support the hypothesis that deleting the requirement that some believe is unnecessary will "discourage

amateur service licensees from advancing their skills in the communications and technical phases of amateur radio."

A review of past years' contest logs received by the ARRL as well as the other major annual contesting events (i.e. CQ, IARU, NAQP, WAE, RSGB, JIDX, AA, etc) will clearly demonstrate that there is significant participation in both SSB and CW. The data will show that the trends are not tending negative for either of these operating modes. Reallocation of the CW sub-bands to other modes will have a deleterious effect on amateur good will across Regions I, II and III.

Best regards,

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